

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No.: 04-10579JLT

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KRISTIN GABEL,

Plaintiff,

v.

RIVERVIEW SCHOOL, AUDRICK J. HAYES,  
STEVEN GRINSELL, AND MAUREEN  
BRENNER,

Defendant.

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**JOINT MOTION TO EXTEND DISCOVERY DEADLINE**

NOW COME the parties in the above-referenced matter and hereby request that the discovery deadline be extended by an additional 30 days, with all other deadlines adjusted accordingly. The current deadline for non-expert discovery is May 25, 2007. As grounds therefore, the parties state that they attended a mediation session with Brad Honoroff of The Mediation Group on March 16, 2007. While the parties did not reach a settlement at the mediation at that time, they continue to actively work with the mediator regarding a possible settlement. As mentioned to the Court at our last appearance, the parties were deliberately withholding depositions to allow the mediation process to proceed. The parties are not that far apart in their demand and offer to conclude that settlement is not possible. Five of the witnesses to be deposed are out of state and the parties believe it makes economic and logistical sense to allow the parties a few more weeks to achieve a resolution before holding these depositions.

WHEREFORE, the parties respectfully request this Honorable Court extend the discovery deadline an additional 30 days to June 25, 2007 with all other deadlines adjusted accordingly.

Respectfully submitted,  
The Plaintiff,  
Kristin Gabel,  
By her attorneys,

/s/ Laurence E. Hardoon  
Laurence E. Hardoon, BBO# 221360  
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Respectfully submitted,  
The Defendants,  
Riverview School, Steven Grinsell,  
and Maureen Brenner,  
By their attorneys,

/s/ Paul E. Stanzler  
Paul E. Stanzler, BBO# 476960  
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Respectfully submitted,  
The Defendant,  
Audrick Hayes,  
By his attorney,

/s/ Thomas P. Kramer  
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DATED: April 26, 2007